



Wyoming State Forestry Division



*Wyoming State Forestry Division
5500 Bishop Blvd.
Cheyenne, WY 82002*

*Matthew H. Mead
Governor*

*Bill Crapser
State Forester*

August 9, 2018

Melissa Martin
LaVA Project Manager
Medicine Bow National Forest
2468 Jackson Street
Laramie, WY 82070

Dear Ms. Martin,

On behalf of the Office of State Lands & Investments – Forestry Division (WSFD), we would like to thank you for the opportunity to comment on the Landscape Vegetation Analysis Project (LaVA) Draft Environmental Impact Statement. The WSFD has been engaged over the last several months as a cooperating agency alongside several other state agencies in working with the USDA Forest Service to address the current conditions on the Medicine Bow National Forest through vegetation management considerations in the form of a project.

Overall we generally support the LaVA project and its use of the Healthy Forest Restoration Act (HFRA). We feel the HFRA Authorities are a good fit in this situation given that the majority of the LaVA Project area now has the 2014 Farm Bill Insect & Disease Designation. The collaborative approach the USFS has utilized has garnered broad public and cooperator support. Additionally there are numerous at-risk communities throughout the project that help to justify the need and appropriateness in using the Healthy Forest Restoration Act.

We are somewhat disappointed in the continued extension of the LaVA Project timeline, with the new date of March 2019 to sign the ROD. While we can understand the variables and constraints that can come up with a project of this size, the WSFD and many co-operators have made significant time and resource investments in helping the Forest Service to refine a product in preparation for the DEIS. Additionally, there has been a large effort to engage the public through local meetings, speaker sessions and material distribution. Given the latest timeline adjustment, we would suggest the Forest Service look to reduce the time delay between the close of the DEIS period (August) and when the FEIS is published (January) whenever possible. Overall we would urge the Forest Service to sign the LaVA Project ROD as soon as possible. This will provide additional time and flexibility in the upcoming field season which was already delayed from when LaVA sales were supposed to be sold in the FY18 field season.

Given the March 2019 signing of a ROD, we would also encourage the USFS to have as much of the design, planning and layout of vegetation management units done ASAP, which would allow for sales to be sold in the first half of the 2019 field season. By not having advanced planning and consideration for vegetation management actions in the 2019 field season, the Forest will likely lose the ability for sales to be operated on in 2019, which in essence would delay treatments for another year.

Additionally, we also support the LaVA Project Purpose and Need. (p15-21). For the purpose of responding to changed forest vegetation conditions as a result of the bark beetle, it makes logical sense. Additionally there is a need to mitigate current and future threats, along with the changed forest conditions, while moving towards desired future conditions of the Forest, as identified in the Medicine Boat National Forest.

We support the Modified Proposed Action (Agency Preferred), generally as presented. We feel the Forest Service has done a good job at addressing a number of items that were addressed during the scoping period, while balancing the resource management needs that should be addressed in this project. Following is a breakdown of additional items regarding our support in the Modified Proposed Action.

- Inventoried Roadless Areas: We support the ability for vegetation management treatments to be conducted on up to 125,200 acres within the Inventoried Roadless areas per Regional review. The WSFD has spent a significant amount of resources in working to propose meaningful areas that could be treated and help to protect identified parcels including state and private lands.
- Temporary Roads: We do not support reducing the cap on temporary road miles to any less than the current level of 600 miles. Temporary roads are important for a project of this scope and their overall impacts once reclaimed are generally minimal. Additionally, we do not support any cap on the amount of open temporary roads at one time, recognizing that workflows may be more in different phases of the project and require more roads in the treatment of larger landscapes.
- Full Suite of Tools: We support the full suite of tools in the treatment opportunity area (TOA) of the 588,513 acres (with treated acres up to 360,000). We would not support any reduction in treatment opportunity or treatment acres for the full suite of tools without strong rationale and demonstrated need in doing so. As was previously mentioned, the WSFD contributed a significant amount of time working to help refine geospatial data into usable shapefiles and information regarding the need and ability for treatments on the ground. The current level of 588,513 in the TOA and potential for 360,000 acres to be treated, is already the result of a compromise that reduced the number of acres from prior input, feedback and analysis. If the need arose, we would support any increases in acreage amounts to provide additional project flexibility.
- Limited Suite of Tools: We also support the treatment opportunity of 24,597 acres having site-specific opportunities for prescribed fire and hand tools only, which are generally located in the MA 1.13 and MA 5.15.

Water Quantity & Quality

We feel the water quantity and quality are important components of the project with the ability to increase both quantity and quality following implementation of the project. This is important for the many needs on the water output from the project area. Of particular note is the importance of maintaining and enhancing the components of the Cheyenne Municipal Water System. This system relies heavily on water from within the project area and the ability to deliver it to the municipal users in Cheyenne. We would encourage working with the Cheyenne Board of Public Utilities as well as the Wyoming State Forestry Division to help in assessing the BOPU Wildfire Hazard Report and working to conduct treatments that would benefit priority catchments.

One issue that has the potential to significantly hinder the overall success of the LaVA project would be the Equivalent Clearcut Acreage or ECA. The WSFD is concerned with the interpretation and implementation of this policy in the LaVA Project and would like to continue discussion with the USFS and other cooperators regarding the final scope of influence the ECA can have on the project. Prior to the FEIS being published, the WSFD would like to schedule a meeting with the USFS to discuss the ECA, its interpretation in regards to the LaVA project, and suggestions for building flexibility in response to unforeseen issues that may arise like wildfires.

Restoration of Wildlife Species Habitat

Much of the LaVA Project area has been ravaged by bark beetles in the latest epidemic for over a decade (p5). As a result many of the dead trees are falling and changing habitat conditions across the forest. The LaVA Project has the ability to help rehabilitate habitat in the short term, resulting in a future habitat with desired future conditions for wildlife. We generally support the use of vegetation treatments to help move existing habitat impacted by falling bark beetle trees towards desired future conditions, resulting in more desirable habitat

General Discussion:

- P.51 – Wildlife: Effects from No Action – We disagree with the statement that there would be no effects beyond the existing condition to wildlife because of no treatments or roads. We would recommend clarification that for some species, the current habitat is in a degraded state as it continues to unravel from the effects of the prior bark beetle epidemic. Additionally, the current habitat will be at greater risk to wildfire and the long-term viability of some of this habitat is in jeopardy.
- P. 51 – Wildlife: Effects from Modified Proposed Action – In reference to the “may affect and is likely to adversely affect Canada lynx” – this specific comment was brought up by WSFD in a cooperator meeting with caution to the exact wording because it was not entirely true. We would recommend clarifying that the effects are in the short-term in the immediate years following vegetation treatment, but in the long-term, as mentioned, habitat and prey species would rebound.
- We support the treatment of up to 360,000 acres over the life of the LaVA Project. As previously mentioned, we would not support any reduction in this cap without specific documentation need and supporting rationale.

- We would encourage the Forest Service to continue coordinating with area contractors in regards to the upcoming work season with a dedicated meeting to address recreational trail impacts. This would ideally be done in the late winter/early spring to coordinate work plans and make preparations for any notice needed for rerouting snowmobile, ATV, hiking, or other trails with regards to vegetation treatments. Overall it has been our experience that these types of meetings are very beneficial for all people involved.

Overall, we support the LaVA Project and feel it has great potential to address the unraveling forest conditions as a result of the bark beetle epidemic. We would like to work with the USFS in the coming weeks and months in addressing some of our concerns that still remain with the LaVA project. We have actively worked with the MBNF throughout the LaVA Project as a cooperator and have been engaged first hand in helping to create a great product. We feel there has been a diligent effort in working with the public to help them understand the current issues facing the MBNF and the benefits this project will help produce.

We would like to thank the USFS for allowing the WSFD to participate in the project as a cooperator and feel that there has been good communication and work that has led to a good product. We look forward to continuing the discussions to help make the LaVA project a success.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bill Crapser", with a stylized, flowing script.

Bill Crapser
State Forester